

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC., )  
  )  
  )  
Plaintiff,                                 )  
  )  
v.    ) Case No. 4:17-cv-00454-GKF-jfj  
  )  
1) CASTLE HILL STUDIOS LLC             )  
(d/b/a CASTLE HILL GAMING);             )  
2) CASTLE HILL HOLDING LLC             )  
(d/b/a CASTLE HILL GAMING); and         )  
3) IRONWORKS DEVELOPMENT, LLC         )  
(d/b/a CASTLE HILL GAMING)             )  
  )  
Defendants.                                 )

**DECLARATION OF RICHARD WILLIAMSON IN SUPPORT OF  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Richard Williamson, hereby declare the following:

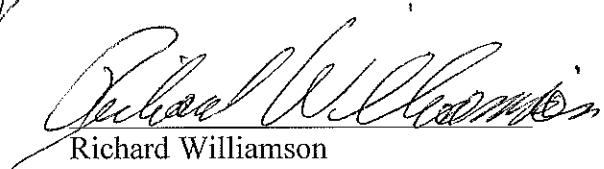
1. I am Vice President of Gaming Compliance with Video Gaming Technologies, Inc., (“VGT”) based in Franklin, Tennessee. I submit this declaration in support of VGT’s Motion for Partial Summary Judgment. Except where otherwise indicated, I have personal knowledge of the facts set forth in this declaration, and, if called to testify, I could and would testify competently thereto.

2. I have worked in gaming compliance with VGT since 2014. Before that, I worked as Senior Vice President of Regulatory Education, International, for BMM testlabs, a gaming testing laboratory. While I worked at BMM testlabs, VGT was a customer of BMM testlabs.

3. As part of my job duties, I am familiar with VGT’s relationships with and agreements with testing laboratories. VGT requires that its testing laboratories undertake confidentiality obligations before it discloses confidential information, such as technical documentation or source code, to the testing laboratories. Attached to my declaration as Exhibits G and H are true and correct copies of agreements with testing laboratories containing such confidentiality obligations. See Ex. G at VGT0056192; Ex. H at VGT0056178.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2018 in <sup>LAS VEGAS, NV</sup> ~~Franklin, TN~~.



A handwritten signature in black ink, appearing to read "Richard Williamson".

Richard Williamson

**CERTIFICATE OF SERVICE**

I hereby certify that on October 12, 2018, I filed the foregoing redacted Declaration of Richard Williamson in Support of Plaintiff's Partial Motion for Summary via ECF, which caused service to be effected on the following counsel for Defendants:

Robert C. Gill  
Thomas S. Schaufelberger  
Matthew J. Antonelli  
Henry A. Platt  
SAUL EWING ARNSTEIN & LEHR, LLP  
1919 Pennsylvania Avenue, NW, Suite 550  
Washington, D.C. 20006  
(202) 295-6605  
(202) 295-6705 (facsimile)  
[robert.gill@saul.com](mailto:robert.gill@saul.com)  
[tschauf@saul.com](mailto:tschauf@saul.com)  
[matt.antonelli@saul.com](mailto:matt.antonelli@saul.com)  
[henry.platt@saul.com](mailto:henry.platt@saul.com)

Sherry H. Flax  
SAUL EWING ARNSTEIN & LEHR, LLP  
500 E. Pratt Street, Suite 900  
Baltimore, Maryland 21202  
(410) 332-8764  
(410) 332-8785 (facsimile)  
[sherry.flax@saul.com](mailto:sherry.flax@saul.com)

James C. Hodges, OBA 4254  
JAMES C. HODGES, PC  
2622 East 21st Street, Suite 4  
Tulsa, OK 74114  
Telephone: (918) 779-7078  
[JHodges@HodgesLC.Com](mailto:JHodges@HodgesLC.Com)

Duane H. Zobrist  
Jonathan S. Jacobs  
ZOBRIST LAW GROUP PLLC  
1900 Arlington Blvd. Suite B  
Charlottesville, VA 22903  
Telephone: (434) 658-6400  
[dzobrist@zoblaw.com](mailto:dzobrist@zoblaw.com)  
[jjacobs@zoblaw.com](mailto:jjacobs@zoblaw.com)

*Attorneys for Defendants*

/s/ Gary M. Rubman